

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

UNITED STATES OF AMERICA)
 vs.) CASE NUMBER:1:18CR029
 PAUL WILSON AISOSA)

MOTION FOR IMPEACHMENT EVIDENCE OF WITNESSES

COMES NOW the Defendant, in accordance with the principles of Brady v. Maryland, 373 U.S. 83 (1963), Giles v. Maryland, 386 U.S. 66 (1967), and Giglio v. United States, 405 U.S. 150 (1972), and moves this Court for entry of an order directing the government to make inquiry and disclose all of the following within its possession, custody or control, or the existence of which is known or by the exercise of due diligence could become known to the government:

(1)

Any and all other records and/or information which arguably could be helpful or useful to the defense in impeaching or otherwise detracting from the probative force of the prosecution's evidence or which arguably could lead to such records or information. This request specifically includes information as to the witness' psychiatric history or "basic mental trouble"; the use of hypnosis or hypnotic age regression, the use of "lie detectors" and the results; and the witness' use of narcotic or

other drugs.

WHEREFORE, the Defendant prays that this motion be granted.

This 6th day of July, 2018.

s/William J. Sussman
ATTORNEY FOR DEFENDANT
347 GREENE STREET
AUGUSTA, GEORGIA 30901-2497
(706) 724-3331
STATE BAR NO: 693000

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing document has been served on Trisha Rhodes, U.S. Attorney's Office, P.O. Box 2017, Augusta, GA 30903 by electronic filing.

This 6th day of July, 2018.

s/William J. Sussman

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